

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

LOUIS G. RASETTA and JOHN J. SHAUGHNESSY,  
as they are TRUSTEES, INTERNATIONAL UNION  
OF OPERATING ENGINEERS LOCAL 4 HEALTH  
AND WELFARE, PENSION AND ANNUITY FUNDS,  
and LOUIS G. RASETTA and CHRISTOPHER  
BARLETTA, as they are TRUSTEES, HOISTING AND  
PORTABLE ENGINEERS LOCAL 4 APPRENTICE  
AND TRAINING FUNDS and INTERNATIONAL  
UNION OF OPERATING ENGINEERS, LOCAL 4,  
Plaintiffs

C.A. No. 05-10425 RCL

vs.

SAI SURVEYING CORPORATION and  
BARBARA SZEPATOWSKI,  
Defendants

and

CITIZENS BANK,  
Trustee

**VERIFIED REQUEST TO ENTER DEFAULT**

Plaintiffs Louis G. Rasetta and John J. Shaughnessy, as they are Trustees, International Union of Operating Engineers Local 4 Health and Welfare, Pension and Annuity Funds, et al, request the Clerk to enter the default of SAI Surveying Corporation (hereinafter "SAI"). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on March 3, 2005.
- 2) Complaint was served on defendant SAI on April 29, 2005.
- 3) SAI has filed neither an Answer nor a responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

LOUIS G. RASETTA and JOHN J.  
SHAUGHNESSY, as they are TRUSTEES,  
INTERNATIONAL UNION OF  
OPERATING ENGINEERS LOCAL 4  
HEALTH AND WELFARE FUND, et al,

By their attorneys,

/s/ Gregory A. Geiman  
Anne R. Sills, Esquire  
BBO #546576  
Gregory A. Geiman, Esquire  
BBO #655207  
Segal, Roitman & Coleman  
11 Beacon Street  
Suite #500  
Boston, MA 02108  
(617) 742-0208

Dated: May 23, 2005

### **VERIFICATION**

I, Gregory A. Geiman, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above Verified Request to Enter Default has been served by first class mail upon defendants SAI Surveying Corporation and Barbara Szepatowski at 23 Narragansett Avenue, Jamestown, RI 02835 this 23<sup>rd</sup> day of May, 2005.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire